

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT A

(March 25, 2019 E-mail from Laura Brown to Laura Young and others)

Peter Benvenuti

From: Stephanie Yee <syee@janglit.com>
Sent: Friday, October 02, 2020 8:58 AM
To: Peter Benvenuti; Alan Jang
Cc: Schirle, Steve (Law); kevin.kramer@weil.com; Thomas Rupp
Subject: RE: PG&E -- CSAA's Motion re Late Filed Claim (Hemingway)
Attachments: Claims Docs (2) 25.pdf; CSAALAW-#5500271-v1-20190201_Letter_from_PGE (002).PDF

Good morning Mr. Benvenuti,

Per Evidence Code §1152 and without waiving any objections, including but not limited to the attorney-client privilege and work product doctrine, we will produce the documents in our possession, responsive to your request. Attached are CSAA's claim notes concerning CSAA's demand letter to PG&E and PG&E's response. Below is a cut and paste of the March 25, 2019 email. Also attached is the attachment to the March 25, 2019 email.

From: Brown, Laura
Sent: Monday, March 25, 2019 9:44 AM
To: Pimienta, Maria <Maria.Pimienta@csaa.com>; Wols, Charleen <Charleen.Wols@csaa.com>; Young, Laura <Laura.Young@csaa.com>; Calvert, Jason <Jason.Calvert@csaa.com>; Moeller, Elaine <elaine.moeller@csaa.com>
Cc: Thiel, Annamaria <Annamaria.Thiel@csaa.com>; Lowery, Dovie <Dovie.Lowery@csaa.com>; Brown, Laura <Laura.X.Brown@csaa.com>
Subject: PG&E Bankruptcy/Restructuring Claims

Good morning team,

Per our discussion this morning...

Please see the attached document, provided by Dorothy, that includes the website for filing claims during the PG&E restructuring – <https://restructuring.primeclerk.com/pge>.

During this time period, we will treat PG&E claims like restitution claims. Takeover o/a and exposures, file the claim through the website, send the demand, and then close the claim while maintaining an activity so the file does not reflect in our potentials.

Thanks!

Sincerely,

Laura Brown

Homeowner Subrogation Specialist
CSAA Insurance Group, a AAA Insurer
PO Box 24523, Oakland, CA 94623

phone: 925-464-4273
fax: 877-548-1610
e-mail: laura.x.brown@csaa.com

Insurance the AAA way

This message may contain information, including personally identifiable information that is confidential, privileged, or otherwise legally protected. If you are not the intended recipient, please immediately notify the sender and delete this message without copying, disclosing, or distributing it.

Stephanie A. Yee

Jang & Associates, LLP
1766 Lacassie Ave. Suite 200 | Walnut Creek, CA 94596
Office: 925.937.1400 | Fax: 925.937.1414 | E-mail: syee@janglit.com



NOTICE TO RECIPIENT | This e-mail is meant for only the intended recipient of the transmission, and may be a communication privileged by law. If you received this e-mail in error, any review, use, dissemination, distribution, or copying is strictly prohibited. Please notify us immediately of the error by return e-mail and please delete this message from your system. Thank you in advance for your cooperation.

For more information about Jang & Associates LLP, please visit www.janglit.com

From: Peter Benvenuti <pbenvenuti@kbkllp.com>
Sent: Wednesday, September 30, 2020 9:59 AM
To: Alan Jang <AJang@janglit.com>; Stephanie Yee <syee@janglit.com>
Cc: Schirle, Steve (Law) <SLSw@pge.com>; kevin.kramer@weil.com; Thomas Rupp <trupp@kbkllp.com>
Subject: PG&E -- CSAA's Motion re Late Filed Claim (Hemingway)

Counsel:

We represent PG&E with regard to the motion you filed on behalf of CSAA on Friday, to permit a late-filed claim.

We are evaluating PG&E's response. Please provide at your early convenience copies of the correspondence dated July 8 and July 20, 2019, referenced in paragraphs 9 and 10 of the declaration of Lauren Brown submitted in support of the motion, and of Ms. Brown's email sent on or about March 25, 2019, referenced in paragraph 8 of the same declaration.

Should you have question about this request, I can be reached by email or via my cell phone (number below).

Thank you in advance for your courtesy.

Peter Benvenuti

Peter J. Benvenuti
Keller Benvenuti Kim LLP
650 California Street, Suite 1900
San Francisco, CA 94108
Direct: 415.364.6798
Cell: 415.722.4299
Fax: 650.636.9251

Email: pbenvenutti@kbklp.com

Web: <http://www.kbklp.com>



This message is being sent from a law firm and may contain confidential or privileged information. If you are not the intended recipient, please advise the sender immediately by reply e-mail and delete this message and any attachments without retaining a copy.